

**FEDERALLY ENFORCEABLE STATE
OPERATING PERMIT (FESOP) RENEWAL
INDIANA DEPARTMENT OF ENVIRONMENTAL
MANAGEMENT
OFFICE OF AIR QUALITY
and
THE CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**National By-Products, Inc.
700 W. Southern Ave.
Indianapolis, Indiana 46225**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F097-14070-00243	
Issued by: Original Signed by John B. Chavez John B. Chavez Administrator, OES	Issuance Date: December 18, 2002 Expiration Date: December 18, 2007

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Quarterly Report Form

Quarterly Report Form

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates boilers and an animal by-products rendering system

Authorized individual:	Tony Croteau
Source Address:	700 W. Southern Ave., Indianapolis, IN. 46225
Mailing Address:	P.O. Box 33639 Indianapolis, IN. 46225
SIC Code:	2047
Source Location Status:	Marion
County Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Under PSD

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) boilers (Nebraska and Cleaver Brooks), identified as emission unit #1 and emission unit #2, each rated at 39.5 million BTU per hour heat input capacity, burning Natural Gas, Distillate Oil #2, and Animal Fat/Greases.
- (b) Animal by-products rendering system, identified as emission unit #3, consisting of
 - (1) one (1) cooker, with 39,000 pounds per hour of raw material input and 9,750 pounds per hour discharge capacity (dry meat meal production - 25% of input) and
 - (2) an ACC forced draft air condenser,
 - (3) controlled by one (1) Millpoint Venturi Scrubber. A second Millpoint packed bed tower scrubber controls fugitive raw material odors.
- (c) One (1) truck meat meal unload pit 12.5 tons per hour feed meal input capacity, identified as emission unit #4.
- (d) Two (2) link-belt conveyors 25 tons per hour feed meal input capacity, identified as emission unit #6 and emission unit #7.
- (e) One (1) hammermill 5 tons per hour feed meal input capacity, identified as emission unit #5.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Small closed top degreaser containing two 16 (sixteen) gallons capacity sump machine parts degreaser/washer basins for maintenance and/or repairs of the plant's equipment. Estimated VOC (a Naphthalene based solution) emissions are 0.06 gallons per hour, 225 pounds per year.
- (b) Small #2 Diesel A.S.T. (above ground storage tank) 300 gallons of #2 diesel oil capacity for in-plant loaders and forklift trucks. The facility uses approximately 2,400 gallons of diesel fuel per year.
- (c) Equipment maintenance activities (painting); estimated amount of paint usage (epoxy based paint) is 50 gallons per year.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) to renew a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permit Conditions

- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
 - (1) incorporated as originally stated,
 - (2) revised, or
 - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the original date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

(a) Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, OES, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

(b) Unless otherwise stated, all terms and conditions in this permit that are local requirements, including any provisions designed to limit the source's potential to emit, are enforceable by the Office of Environmental Services.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-8-3(f)] [326 IAC 2-8-4(5)(E)] [326 IAC 2-8-5(a)(4)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall furnish to IDEM, OAQ, and OES within a reasonable time, any information that IDEM, OAQ, and/or OES may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ and OES copies of records required to be kept by this permit or, for information claimed to be confidential, the Permittee may furnish such records directly to the U. S. EPA along with a claim of confidentiality.[326 IAC 2-8-4(5)(E)]
- (c) The Permittee may include a claim of confidentiality in accordance with 326 IAC 17. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ and/or OES may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Compliance with Permit Conditions [326 IAC 2-8-4(5)(A)] [326 IAC 2-8-4(5)(B)]

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for:
 - (1) Enforcement action;
 - (2) Permit termination, revocation and reissuance, or modification; and
 - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (c) An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in condition B, Emergency Provisions.

B.11 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.12 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, and/or OES on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
- (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
 - (2) The compliance status;
 - (3) Whether compliance was continuous or intermittent;
 - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
 - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, and/or OES may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.13 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:
- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
 - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

- (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ and/or OES upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ and/or OES. IDEM, OAQ and/or OES may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner and/or OES within a reasonable time.

B.14 Emergency Provisions [326 IAC 2-8-12]

- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation,
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
 - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
 - (2) The permitted facility was at the time being properly operated;
 - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
 - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ or OES, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

IDEM, OAQ,
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)
or,
Telephone No.: 317-233-5674 (ask for Compliance Section)
Facsimile No.: 317-233-5967

OES
Telephone No.: 317/327-2234
Facsimile No.: 317/327-2274

Failure to notify IDEM, OAQ or OES, by telephone or facsimile within four (4) daytime business hours after the beginning of the emergency, or after the

emergency is discovered or reasonably should have been discovered, shall constitute a violation of 326 IAC 2-8 and any other applicable rules. [326 IAC 2-8-12(f)]

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
 - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
 - (e) IDEM, OAQ and/or OES may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
 - (f) Failure to notify IDEM, OAQ or OES by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
 - (g) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.
- (c) Emergencies shall be included in the Quarterly Deviation and Compliance Monitoring Report.

B.16 Permit Modification, Reopening, Revocation and Reissuance, or Termination
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ or OES determines any of the following:
- (1) That this permit contains a material mistake.
 - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
 - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]
- (c) Proceedings by IDEM, OAQ and/or OES to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ or OES at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ or OES may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.17 Permit Renewal [326 IAC 2-8-3(h)]

- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and/or OES and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
- (1) A timely renewal application is one that is:
- (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.
- (2) If IDEM, OAQ and/or OES upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ and/or OES takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ and OES any additional information identified as needed to process the application.

B.18 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- and
- City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097
- Any such application should be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.19 Operational Flexibility [326 IAC 2-8-15]

- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
 - (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
 - (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
 - (4) The Permittee notifies the:
- Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
- and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ and OES in the notices specified in 326 IAC 2-8-15(b), (c)(1), and (d).

- (b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-8-15(a) and the following additional conditions:
 - (1) A brief description of the change within the source;
 - (2) The date on which the change will occur;
 - (3) Any change in emissions; and
 - (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

- (c) Emission Trades [326 IAC 2-8-15(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (d) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.20 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.21 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ and/or OES, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
 - (1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration (PSD) not applicable.
 - (2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
 - (3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided that the source's potential to emit does not exceed the above specified limits.
- (c) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment is are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
 - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
 - (2) If there is a change in the following:
 - (A) Asbestos removal or demolition start date;
 - (B) Removal or demolition contractor; or
 - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ and/or OES not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Maintenance of Emission Monitoring Equipment [326 IAC 2-8-4(3)(A)(iii)]

- (a) In the event that a breakdown of the emission monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation.
- (b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.14 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on September 24, 1997.

- (b) Upon direct notification by IDEM, OAQ and/or OES that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.15 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall submit:

- (a) A compliance schedule for meeting the requirements of 40 CFR 68; or
- (b) As a part of the annual compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

All documents submitted pursuant to this condition shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

- (a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ and OES upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

- (1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.
- (2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

- (b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

- (1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or
- (2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.
- (3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

- (4) Failure to take reasonable response steps shall constitute a violation of the permit.
- (c) The Permittee is not required to take any further response steps for any of the following reasons:
 - (1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.
 - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.
 - (3) An automatic measurement was taken when the process was not operating.
 - (4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.
- (d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.
- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.
- (f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

The emission statement does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.

C.19 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner or OES makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or OES within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

City of Indianapolis
Office of Environmental Services
Air Quality Management Section
2700 South Belmont Avenue
Indianapolis Indiana 46221-2097

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ and/or OES on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

Two (2) boilers (Nebraska and Cleaver Brooks), identified as emission unit #1 and emission unit #2, each rated at 39.5 million BTU per hour heat input capacity, burning Natural Gas, Distillate Oil #2, and Animal Fat/Greases.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Sulfur Dioxide (SO₂) [326 IAC 7-1.1-1] [326 IAC 12-1][40 CFR Part 60, Subpart Dc]

Pursuant to 326 IAC 7-1.1 (SO₂ Emissions Limitations) and 40 CFR 60, Subpart Dc (Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units):

- (a) The SO₂ emissions from each of the two (2) natural gas and fuel oil #2 fired boilers shall not exceed five tenths (0.5) pounds per million Btu heat input; or
- (b) The sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight. [40 CFR 60.42c(d)]

Pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur content limit applies at all times, including periods of startup, shutdown, and malfunction.

D.1.2 Sulfur Dioxide (SO₂) Limit [326 IAC 2-8]

- (a) The total usage of #2 fuel oil shall not exceed 2,715,996 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is equivalent to limiting SO₂ emissions from the source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, 326 IAC 2-7 (Part 70 Permit Program) does not apply.
- (b) For the purposes of determining compliance with SO₂ limit, every million cubic feet of natural gas burned is equivalent to 8.45 gallons of Oil No. 2; every gallon of Animal Fat/Greases burned is equivalent to 0.553 gallons of Oil #2.

D.1.3 Nitrogen Oxides (NO_x) Limit [326 IAC 2-8]

- (a) The total usage of animal fat/greases shall not exceed 3,563,004 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is equivalent to limiting NO_x emissions from the source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, and 326 IAC 2-7 (Part 70 Permit Program) does not apply.
- (b) For the purposes of determining compliance with NO_x limit, every million cubic feet of natural gas burned is equivalent to 2,545 gallons of Animal Fat/Grease, every gallon of No. 2 oil burned is equivalent to 0.364 gallons of Animal Fat/Grease.

D.1.4 Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emissions for Sources of Indirect Heating), the PM emissions from each emission unit #1 and #2 shall not exceed 0.43 pound per million Btu (lb/MMBtu) heat input. This limitation was calculated using the following equation:

$$Pt = \frac{0.87}{Q^{0.16}}$$

Where: Pt = Pounds of particulate matter emitted per million
Btu (lb/mmBtu) heat input

D.1.5 Opacity [326 IAC 12-1][40 CFR 60.43(c)]

Pursuant to NSPS 40 CFR 60.43(c), the owner or operator of this source shall not cause to discharge into the atmosphere from the boilers EU #1 and #2 gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of no more than 27 percent opacity.

D.1.6 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B of this permit, is required for this facility.

Compliance Determination Requirements

D.1.7 Sulfur Dioxide (SO₂) and Nitrogen Oxides (NO_x) Emissions

Compliance with Condition D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the total sulfur dioxide and nitrogen oxide compound usage for the most recent twelve (12) month period.

D.1.8 Sulfur Dioxide Emissions and Sulfur Content

Pursuant to 40 CFR 60, Subpart Dc, the Permittee shall demonstrate compliance utilizing one of the following options:

- (a) Providing vendor analysis of fuel delivered, if accompanied by a vendor certification; or
- (b) Analyzing the oil sample to determine the sulfur content of the oil via the procedures in 40 CFR 60, Appendix A, Method 19.
 - (1) Oil samples may be collected from the fuel tank immediately after the fuel tank is filled and before any oil is combusted; and
 - (2) If a partially empty fuel tank is refilled, a new sample and analysis would be required upon filling.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the stack exhaust shall be performed once per shift, during normal daylight operations, when combusting #2 fuel oil or Animal Fat/Grease. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response

steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.10 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (6) below. Note that pursuant to 40 CFR 60 Subpart Dc, the fuel oil sulfur limit applies at all times including periods of startup, shutdown, and malfunction.

- (1) Calendar dates covered in the compliance determination period;
- (2) Actual fuel oil usage since last compliance determination period and equivalent sulfur dioxide emissions;
- (3) A certification, signed by the owner or operator, that the records of the fuel supplier certifications represent all of the fuel combusted during the period, the natural gas fired boiler certification does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1); and

If the fuel supplier certification is used to demonstrate compliance the following, as a minimum, shall be maintained:

- (4) Fuel supplier certifications.
- (5) The name of the fuel supplier; and
- (6) A statement from the fuel supplier that certifies the sulfur content of the fuel oil.

The Permittee shall retain records of all recording/monitoring data and support information for a period of five (5) years, or longer if specified elsewhere in this permit, from the date of the monitoring sample, measurement, or report. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit.

(b) To document compliance with Condition D1.2 and D.1.3, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken daily and shall be complete and sufficient to establish compliance with the SO₂ and NO_x emission limits established in Condition D.1.2 and D.1.3 respectively.

- (1) A log of the dates of use;
- (2) The total #2 fuel oil, natural gas, and Animal Fat/Greases usage for each month; and

(c) To document compliance with Condition D.1.9, the Permittee shall maintain records of visible emission notations of the emission units #1 and #2 stack exhaust once per shift.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and D.1.3 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- Animal by-products rendering system, identified as emission unit #3, consisting of
- (1) one (1) cooker, with 39,000 pounds per hour of raw material input and 9,750 pounds per hour discharge capacity (dry meat meal production - 25% of input) and
 - (2) an ACC forced draft air condenser,
 - (3) controlled by one (1) Millpoint Venturi Scrubber. A second Millpoint packed bed tower scrubber controls fugitive raw material odors.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) Limit [326 IAC 8-1-6]

- (a) The VOC emission from Emission Unit #3 shall be limited to less than 0.400 pounds per ton of meat meal production.
- (b) Meat meal production usage shall be limited to 36,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is equivalent to limiting VOC emissions from the emission unit to less than (25) tons per twelve (12) consecutive month period. Therefore, 326 IAC 8-1-6 (General VOC Reduction Requirements) does not apply.

D.2.2 Particulate [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Emission Unit # 3 shall not exceed 11.85 pounds per hour when operating at a process weight rate of 170,820 tons per year.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B of this permit, is required for this facility.

Compliance Determination Requirements

D.2.4 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, and OES reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.5 VOC Emissions

Compliance with Condition D.2.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.2.6 Testing Requirements [326 IAC 2-8-5]

In order to demonstrate compliance with Condition D.2.1 and D.2.2, the Permittee shall perform VOC and PM testing utilizing methods as approved by the Commissioner of IDEM and Administrator of OES. This test shall be repeated at least once every five (5) years from the date of a valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.2.7 Visible Emissions Notations

- (a) visible emission notations of the Emission Units #1 and #2 stack exhausts shall be performed once per shift during normal daylight operations when burning distillate oil #2 or Animal Fat/Greases and exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Preventive Maintenance Plan for these units shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.2.8 Parametric Monitoring

The Permittee shall record the total static pressure drop across the scrubber controlling emissions from emission unit #3 the animal by-products rendering system, at least once per shift when emission unit #3 the animal by-products rendering system is in operation. When for any one reading, the pressure drop across the scrubber is outside the normal range of 3.0 and 6.0 inches of water or a range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C- Compliance Response Plan-Failure to Take Response Steps. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and OES and shall be calibrated at least once every six (6) months.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.2.9 Record Keeping Requirements

- (a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) and (2) below. Records maintained for (1) and (2) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.2.1.

- (1) A log of the dates of use and
 - (2) The total meat meal usage for each month.
- (b) To document compliance with Condition D.2.7 the Permittee shall maintain records of visible emission notations of the facility stack exhaust once per shift.
- (c) To document compliance with Condition D.2.8, the Permittee shall maintain records of the following operational parameters once per shift during normal operation:
- (1) Inlet and outlet differential static pressure; and
 - (2) Cleaning cycle operation.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.10 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

- (c) One (1) truck meat meal unload pit 12.5 tons per hour feed meal input capacity, identified as emission unit #4.
- (d) Two (2) link-belt conveyors 25 tons per hour feed meal input capacity, identified as emission unit #6 and emission unit #7.
- (e) One (1) hammermill 5 tons per hour feed meal input capacity, identified as emission unit #5.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(e)]

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), particulate from the emission unit ID's #4, #5 and #6 and #7 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) Process weight for Hammer Mill, emission unit #4, will not exceed 12.05 pounds per hour based on a process weight rate of 12.5 tons per hour.
- (b) Process weight for Truck Unload Pit, emission unit #5, will not exceed 22.27 pounds per hour based on a process weight rate of 25 tons per hour.
- (c) Process weight for Link Belt Conveyors, emission units #6 and #7, will not exceed 35.43 pounds per hour each based on a process weight rate of 5 tons per hour.

D.3.2 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B of this permit, is required for this facility.

Compliance Monitoring Requirements [326 IAC 2-8-5(a)(1)]

D.3.3 Visible Emissions Notations

- (a) Visible emission notations of the facility stack exhaust shall be performed once per shift during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

D.3.4 Record Keeping Requirements

- (a) To document compliance with Condition D.3.3, the Permittee shall maintain records of daily visible emission notations of the facility exhaust.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE BRANCH SECTION
and
CITY OF INDIANAPOLIS
OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
CERTIFICATION**

Source Name: National By-Products, Inc.
Source Address: 700 W. Southern Ave., Indianapolis, IN. 46225
Mailing Address: P.O. Box 33639 Indianapolis, IN. 46203
FESOP No.: 097-14070-0023

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) _____
- 9 Report (specify) _____
- 9 Notification (specify) _____
- 9 Affidavit (specify) _____
- 9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

**P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967**

and

**CITY OF INDIANAPOLIS
OFFICE OF ENVIRONMENTAL SERVICES
DATA COMPLIANCE**

**2700 South Belmont Avenue
Indianapolis, Indiana 46221
Phone: 317-327-2234
Fax: 317-327-2274**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT**

Source Name: National By-Products, Inc.
Source Address: 700 W. Southern Ave., Indianapolis, IN. 46225
Mailing Address: P.O. Box 33639 Indianapolis, IN. 46203
FESOP No.: 097-14070-00243

This form consists of 2 pages

Page 1 of 2

9 This is an emergency as defined in 326 IAC 2-7-1(12)
CThe Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
CThe Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

Page 2 of 2

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO ₂ , VOC, NO _x , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

A certification is not required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION
and
INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
AIR QUALITY MANAGEMENT SECTION
DATA COMPLIANCE**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
SEMI-ANNUAL NATURAL GAS FIRED BOILER CERTIFICATION**

Source Name: National By-Products, Inc.
Source Address: 700 W. Southern Ave., Indianapolis, IN. 46225
Mailing Address: P.O. Box 33639 Indianapolis, IN. 46203
FESOP No.: 097-14070-00243

9	Natural Gas Only
9	Alternate Fuel burned
From: _____ To: _____	

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.	
Signature:	
Printed Name:	
Title/Position:	
Phone:	
Date:	

A certification by the responsible official as defined by 326 IAC 2-7-1(34) is required for this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES
 and
 INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE
 Quarterly Report**

Source Name: National By-Products, Inc.
 Source Address: 700 W. Southern Ave., Indianapolis, IN. 46225
 Mailing Address: P.O. Box 33639 Indianapolis, IN. 46203
 FESOP No.: 097-14070-00243
 Facility: Boilers, Emission Unit ID 1 and Emission Unit ID 2
 Parameter: Sulfur Content (%), SO2 limit Fuel Oil Usage
 Limit: 0.5 lbs SO₂/MMBtu; 0.5 % Sulfur; & 2,715,996 gallons of fuel oil #2 per twelve (12) consecutive month period with compliance determined at the end of each month.

Quarter: _____ Year: _____

Month	Sulfur Content (%)	
	Oil #2	Animal Fat

SO₂ Emission Factors (EF):
 Natural Gas: EF=0.6 lb/MMCF; Distillate Oil #2: EF=142xS lb/kgal (S - weight % Sulfur; at S=0.5% Emission Factor: 71 lb/kgal); Animal Fat: EF=78.5xS lb/kgal (S - weight % Sulfur; at S=0.5% Emission Factor: 39.25 lb/kgal).

Equivalency factors:
 For SO₂ emissions: 1 MMCF of Natural Gas = 8.45 gal of Oil #2; 1 gal of Animal Fat/Grease = 0.553 gal of Oil #2.

Month	Fuel Usage			NO _x Emissions, ton			SO ₂ Emissions, ton		
	MMCF (Natural Gas)	kgal (oil #2)	kgal (Animal Fat)	This month	Previous 11 months	12 month rolling	This month	Previous 11 months	12 month rolling

* Add additional rows if more than one fuel was burned in any current month.

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS OFFICE OF ENVIRONMENTAL SERVICES
 AIR QUALITY MANAGEMENT SECTION
 DATA COMPLIANCE
 Quarterly Report**

Source Name: National By-Products, Inc.
 Source Address: 700 W. Southern Ave., Indianapolis, IN. 46225
 Mailing Address: P.O. Box 33639 Indianapolis, IN. 46203
 FESOP No.: 097-14070-00243
 Facility: Boilers, Emission Unit ID 1 and Emission Unit ID 2
 Parameter: Fuel Usage NOx limit
 Limit: 3,563,004 gallons of Animal Fat/Greases per twelve (12) consecutive month period with compliance determined at the end of each month.

Quarter: _____ Year: _____

NOx Emission Factors (EF):
 Natural Gas: EF=**140** lb/MMCF; Distillate Oil #2: EF=**20** lb/kgal; Animal Fat: EF=**55** lb/kgal.

Equivalency factors:
 For NOx emissions: 1 MMCF of Natural Gas = 2,545 gal of Animal Fat/Grease; 1 gal of Oil #2 = 0.364 gal of Animal Fat/Grease.

Month	Fuel Usage			NOx Emissions, ton		
	MMCF (Natural Gas)	kgal (oil #2)	kgal (Animal Fat)	This month	Previous 11 months	12 month rolling

* Add additional rows if more than one fuel was burned in any current month.

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

FESOP Quarterly Report

Source Name: National By-Products, Inc.
 Source Address: 700 W. Southern Ave., Indianapolis, IN. 46225
 Mailing Address: P.O. Box 33639, Indianapolis, IN. 46203
 FESOP No.: F097-14070-00243
 Facility: Animal By-Products Rendering System, Emission Unit ID # 3
 Parameter: VOC
 Limit: Less than 25 tons/12 consecutive month period; 36,000 tons meat meal production per 12 consecutive month period with compliance determined at the end of each month (emission factor: 0.4 lb VOC/ ton of meat meal production).

QUARTER: _____ YEAR: _____

Month	Meal production throughput this month (tons)	Meal production throughput Previous 11 Months	Meal production throughput 12 consecutive month period

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
 Deviation has been reported on: _____

Submitted by: _____
 Title / Position: _____
 Signature: _____
 Date: _____
 Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
 OFFICE OF AIR QUALITY
 COMPLIANCE DATA SECTION
 and
 CITY OF INDIANAPOLIS
 OFFICE of ENVIRONMENTAL SERVICES**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
 QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: National By-Products, Inc.
 Source Address: 700 W. Southern Ave., Indianapolis, IN. 46225
 Mailing Address: P.O. Box 33639 Indianapolis, IN. 46203
 FESOP No.: 097-14070-00243

Months: _____ **to** _____ **Year:** _____

<p>This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".</p>	
<p>9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.</p>	
<p>9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	
<p>Permit Requirement (specify permit condition #)</p>	
<p>Date of Deviation:</p>	<p>Duration of Deviation:</p>
<p>Number of Deviations:</p>	
<p>Probable Cause of Deviation:</p>	
<p>Response Steps Taken:</p>	

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Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	Duration of Deviation:
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

**Addendum to the Technical Support Document for a
Federally Enforceable State Operating Permit (FESOP) Renewal**

Source Background and Description

Source Name:	National By-Products, Inc.
Source Location:	700 W. Southern Avenue. Indianapolis, IN. 46225
County:	Marion
SIC Code:	2047
Operation Permit No.:	F097-14070-00243
Permit Reviewer:	Monica Dick

On October 4, 2002, the Office of Air Quality (OAQ) and the Office of Environmental Services (OES) had a notice published in the Indianapolis Star, Indianapolis, Indiana, stating that National By-Products had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal to operate boilers and an animal by-products rendering system. The notice also stated that OAQ and OES proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed. Comments were received from the source.

OES and OAQ have made the following change to the permit. The TSD will remain as it originally appeared when published. Bolded language has been added; language with a line through it has been deleted.

Change 1:

Quarterly Reports

The quarterly reports were changed to read as follows:

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Limit: 0.5 lbs SO₂/MMBtu; 0.5 % Sulfur; & 2,715,996 gallons of fuel oil #2 per twelve (12) consecutive month period **with compliance determined at the end of each month.**

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Limit: 3,563,004 gallons of Animal Fat/Greases per twelve (12) consecutive month period **with compliance determined at the end of each month.**

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Limit: Less than 25 tons/12 consecutive month period; 36,000 tons meat meal production per 12 consecutive month period **with compliance determined at the end of each month** (emission factor: 0.4 lb VOC/ ton of meat meal production).

Change 2:

Condition B.22(c), the rule cite should be 326 IAC 2-8-10(b)(3).

B.22 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. ~~[326 IAC 2-8-11(b)(3)]~~**[326 IAC 2-8-10(b)(3)]**

Change 3:

Condition B.23, should include [326 IAC 2-1.1-7] on the authority line. 326 IAC 2-1.1-7 specifies that nonpayment may result in revocation of the permit. This is not specified in 326 IAC 2-8; therefore, this rule cite is being added to B.23.

B.23 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16]**[326 IAC 2-1.1-7]**

Change 4:

Condition C.1 Particulate Emission Limitations was added to the permit to clarify source wide applicability. All of the conditions following C.1 in Section C have been renumbered and the table of contents has been updated.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P]**[326 IAC 6-3-2]**

- a. Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- b. Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

Change 5:

Condition C.7(e) (now renumbered as C.8(e)), the rule cite should be 326 IAC 14-10-1 in the second sentence.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

- (e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per ~~326 IAC 14-10-4~~ **326 IAC 14-10-1** emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on

pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

Change 5:

Condition C.15(e) (now renumbered as C.16(e)), the rule cite was corrected to reflect the FESOP rules instead of the Title V rules.

C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4]
[326 IAC 2-8-5]

- (e) The Permittee shall record all instances when response steps are taken. In the event of an emergency, the provisions of ~~326 IAC 2-7-16~~ **326 IAC 2-8-12** (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

Change 6:

The first sentence of the Quarterly Deviation and Compliance Monitoring Report is being removed, because it poses a conflict with the provisions that require an annual certification. We were not intending to turn this quarterly report into a compliance certification.

~~This report is an affirmation that the source has met all the requirements stated in this permit.~~ This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

Source Comments:

Comment 1 (by phone):

A source representative inquired as to why a condition was added to the FESOP requiring testing so soon after a their latest test.

Response 1:

National By-Products conducted a stack test on May 15, 2002, which verified compliance with the permit. It is the intent of OES and OAQ to require testing once every five years. Therefore, the condition has been changed as follows:

~~D.2.6 Testing Requirements [326 IAC 2-8-5]~~

~~During the period between 180 days and 360 days after issuance of this permit, in~~ In order to demonstrate compliance with Condition D.2.1 and D.2.2, the Permittee shall perform VOC and PM testing utilizing methods as approved by the Commissioner of IDEM and Administrator of OES. This test shall be repeated at least once every five (5) years from the date of ~~this~~ a valid compliance demonstration. Testing shall be conducted in accordance with Section C- Performance Testing.

Comment 2(received by fax):

There are a number of differences between the originally issued FESOP and how it appears now upon renewal. A list of the differences are as follows:

1. Emergency Occurrence Report

2. Quarterly Deviation & Compliance Monitoring Report
3. Compliance Response Plan
4. Emission Statement
5. Semi-Annual Natural Gas Fired Boiler Certification

Response 2:

1. Condition B.14 Emergency Provisions [326 IAC 2-8-12] requiring the reporting of emergencies was incorporated in both the original FESOP and now. An Emergency Occurrence Report form is now included in the permit. No additional requirements have been added since the original FESOP was issued.

Many applicants have stated that obtaining a certification by the responsible official, which is required by rule, would cause difficulty in meeting the requirement to submit the report within 2 days. Therefore, IDEM has negotiated with EPA on the reporting of emergencies. They agree to allow the 2 day notification to come in without the responsible official certification as long as the emergencies are included in the Quarterly Deviation and Compliance Monitoring Report. That report is certified by the responsible official and will meet the requirement to have all reports certified.

2. Condition B.15 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)] was incorporated in both the original FESOP and now.

The Quarterly Deviation & Compliance Monitoring Report form was changed. We are no longer requiring sources to report deviations in ten days. Therefore, every source will need to submit this report quarterly and certified by the responsible official.

In addition, the original permit required the reporting of the probable cause of a deviation, and any corrective actions or preventative measures taken. Currently, we require the reporting of the probable cause and the response steps taken. The difference between corrective action and response steps is a name change only and not a change in the requirements.

3. Condition C.16 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5], which is now in the FESOP, is the same requirement as Condition C.11 Failure to Take Corrective Action found in the originally issued FESOP.
4. Condition C.12 Emission Reporting [326 IAC 2-6] found in the originally issued FESOP and Condition C.18 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)], which is now in the FESOP, is the same requirement. National By-Products is currently submitting those statements.
5. The Semi-Annual Natural Gas Fired Boiler Certification was added to the FESOP, because visible emission notations are not required when combusting natural gas only. Therefore, a completed Natural Gas Fired Boiler Certification substitutes for the record keeping when combusting natural gas only. The Natural Gas Fired Boiler Certification will need to be certified by the responsible official, therefore the last line in each of these reports require an attached signed certification to complete this report.

Regarding comment 2, no changes were made to the permit following the October 4, 2002 period of public notice.

**Indiana Department of Environmental Management
Office of Air Quality
and
City of Indianapolis
Office of Environmental Services**

Technical Support Document (TSD) for a Federally Enforceable State
Operating Permit (FESOP) Renewal

Source Background and Description

Source Name:	National By-Products, Inc.
Source Location:	700 W. Southern Avenue. Indianapolis, IN. 46225
County:	Marion
SIC Code:	2047
Operation Permit No.:	F097-14070-00243
Permit Reviewer:	Monica Dick

The Office of Air Quality (OAQ) and the City of Indianapolis Office of Environmental Services (OES) have reviewed a FESOP renewal application from National By-Products, Inc. relating to the operation of boilers and an animal by-products rendering system. National By-Products, Inc. was issued its initial FESOP 097-5579-00243 on December 13, 1996.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Two (2) boilers (Nebraska and Cleaver Brooks), identified as emission unit #1 and emission unit #2, each rated at 39.5 million BTU per hour heat input capacity, burning Natural Gas, Distillate Oil #2, and Animal Fat/Greases.
- (b) Animal by-products rendering system, identified as emission unit #3, consisting of
 - (1) one (1) cooker, with 39,000 pounds per hour of raw material input and 9,750 pounds per hour discharge capacity (dry meat meal production - 25% of input) and
 - (2) an ACC forced draft air condenser,
 - (3) controlled by one (1) Millpoint Venturi Scrubber. A second Millpoint packed bed tower scrubber controls fugitive raw material odors.
- (c) One (1) truck meat meal unload pit 12.5 tons per hour feed meal input capacity, identified as emission unit #4.
- (d) Two (2) link-belt conveyors 25 tons per hour feed meal input capacity, identified as emission unit #6 and emission unit #7.
- (e) One (1) hammermill 5 tons per hour feed meal input capacity, identified as emission unit #5.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Small closed top degreaser containing two 16 (sixteen) gallons capacity sump machine parts degreaser/washer basins for maintenance and/or repairs of the plant's equipment. Estimated VOC (a Naphthalene based solution) emissions are 0.06 gallons per hour, 225 pounds per year.
- (b) Small #2 Diesel A.S.T. (above ground storage tank) 300 gallons of #2 diesel oil capacity for in-plant loaders and forklift trucks. The facility uses approximately 2,400 gallons of diesel fuel per year.
- (c) Equipment maintenance activities (painting); estimated amount of paint usage (epoxy based paint) is 50 gallons per year.

Existing Approvals

- (a) FESOP 097-5579-00243, issued on December 13, 1996; and expiring on December 13, 2001, and
- (b) First Significant Permit Revision 097-11785-00243, issued on May 4, 2001.

All conditions from previous approvals were incorporated into this FESOP permit except the following:

First Significant Permit Revision 097-11785-00243, issued on May 4, 2001.

Condition D.2.5: Particulate Matter

That during the period between 180 days and 360 days after issuance of this permit, the permittee shall perform PM and PM10 testing utilizing methods per 40 CFR Part 60 Appendix A, Method 5, 17, 40 CFR Part 51 Appendix M, Method 201, 201a, 202, as approved by the Administrator. This test shall be repeated at least once every five years from the date of this valid compliance demonstration. PM10 include filterable and condensable PM10.

Reason not incorporated: A condition to include a PM test is incorporated into the FESOP Renewal. The stack test for PM is required to satisfy compliance with an applicable limit. There is not an applicable PM-10 limit for this source. A testing requirement for PM-10 was inadvertently incorporated into the permit. Therefore, PM-10 does not need to be verified through testing.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Administrator that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on March 9, 2001.

There was no notice of completeness letter mailed to the source.

Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	88.0
PM-10	44.1
SO ₂	182.4
VOC	60.3
CO	13.6
NO _x	127.91
HAP	negligible

Note: For the purpose of determining applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

- (a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of NO_x and SO₂ is equal to or greater than 100 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) Pursuant to 326 IAC 2-8, this source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict PTE to below Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP).
- (c) Fugitive Emissions
 Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

This table reflects the actual reported emissions from the 2001 year emission statement.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	1.94
PM-10	1.94
SO ₂	7.33
VOC	1.99
CO	8.23
NO _x	14.28

Note: For the purpose of determining applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

Potential to Emit After Issuance

The source, issued a FESOP on December 13, 1996, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP (F097-5579-00243; issued on December 13, 2001) and the First Significant Permit Revision (097-11785-00243).

Process/emission unit	Potential to Emit After Issuance						
	PM	PM-10	SO ₂	VOC	CO	NO _x	HAPs
Two (2) Boilers 39.5MBtu each, EU #1 & #2	⁽¹⁾ 0.43 #/MMBtu	⁽¹⁾ 0.43 #/MMBtu	96.2	2.28	11.53	98.0	0
Rendering System, EU #3	⁽²⁾ 11.85 #/hr	⁽²⁾ 11.85 #/hr	2.8	<25.0 t/yr	0.5	1.0	0
Hammer Mill, EU #4	⁽²⁾ 12.05 #/hr	⁽²⁾ 12.05 #/hr	0	0	0	0	0
Truck Unload Pit, EU #5	⁽²⁾ 22.27 #/hr	⁽²⁾ 22.27 #/hr	0	0	0	0	0
Link-Belt, EU #6 & #7	⁽²⁾ 35.43	⁽²⁾ 35.43	0	0	0	0	0
Insignificant Activities	0	0	0	<5	0	0	0
Total Emissions	<100t/yr	<100t/yr	<100t/yr	<32.28	9.4	<100t/yr	0

⁽¹⁾ Based on Particulate Matter (PM) limit [326 IAC 6-2-2]

⁽²⁾ Particulate Matter (PM) [326 IAC 6-3-2]

County Attainment Status

The source is located in Marion County.

Pollutant	Status
PM-10	unclassifiable
SO ₂	maintenance attainment
NO ₂	attainment
Ozone	maintenance attainment
CO	attainment
Lead	unclassifiable

Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Marion County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

- (a) This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Dc) because boilers EU#1 and EU #2 have heat input capacity of 39.5 MMBtu/hr (more than 10 MMBtu/hr) each and were constructed after 1989.
- (b) Pursuant to NSPS 40 CFR 60, Subpart Dc, the owner or operator of this source shall not cause to discharge into the atmosphere from the boilers EU #1 and #2 gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity and the sulfur content of the fuel oil shall not exceed five-tenths percent (0.5%) by weight.
- (c) This source is not subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60, Subpart Kb), because the volatile organic liquid storage vessel has a capacity that is less than 40 cubic meters.

- (d) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs). 326 IAC 20-6-1 (40 CFR 63, Subpart T) applies to halogenated solvent cleaners. National By-Products, Inc. uses a naphthalene based solution not a halogenated solvent.

State Rule Applicability - Entire Source

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on September 24, 1997. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 1-6-3 (Preventive Maintenance Plan)

The source has submitted a Preventive Maintenance Plan (PMP) on August 30, 2000. This PMP has been verified to fulfill the requirements of 326 IAC 1-6-3 (Preventive Maintenance Plan).

326 IAC 2-2 (PSD)

The source is not 1 of the 28 listed sources, it has a potential to emit less than the levels set for any stationary source, and it was constructed prior to 1977. Therefore, the source predated the PSD requirement. In May of 2001, a modification was made to the source. However, the modification did not increase the potential to emit of the source to a level that met the definition of "major stationary source". Therefore, the source is not subject to 326 IAC 2-2 (PSD) and it remains a minor source under PSD.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants)

The source is not subject to 326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants), because the source is not a major source of hazardous air pollutants.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Marion County and has the potential to emit more than ten (10) tons per year of NO_x. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

Potential to Emit limit 326 IAC 2-8-4

Since SO₂ and NO_x potential emissions are above 100 tons per year, emission limits are needed such that the source does not fall within any of the categories listed in 326 IAC 2-7-2(a).

Sulfur Dioxide (SO₂) Limit [326 IAC 2-8]

- (a) The total usage of #2 fuel oil shall not exceed 2,715,996 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is equivalent to limiting SO₂ emissions from the source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, 326 IAC 2-7 (Part 70 Permit Program) does not apply.
- (b) For the purposes of determining compliance with SO₂ limit, every million cubic feet of natural gas burned is equivalent to 8.45 gallons of Oil No. 2; every gallon of Animal Fat/Greases burned is equivalent to 0.553 gallons of Oil #2.

Nitrogen Oxides (NO_x) Limit [326 IAC 2-8]

- (a) The total usage of animal fat/greases shall not exceed 3,563,004 gallons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is equivalent to limiting NO_x emissions from the source to less than one hundred (100) tons per twelve (12) consecutive month period. Therefore, and 326 IAC 2-7 (Part 70 Permit Program) does not apply.

- (b) For the purposes of determining compliance with NOx limit, every million cubic feet of natural gas burned is equivalent to 2,545 gallons of Animal Fat/Grease, every gallon of No. 2 oil burned is equivalent to 0.364 gallons of Animal Fat/Grease.

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

Two (2) natural gas and fuel oil #2 fired boilers

Particulate Matter (PM) 326 IAC 6-1-1 and 6-2

Marion County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-12 and neither have the potential to emit one hundred (100) tons per year of PM or actuals of ten (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

Since the emission units are a source of indirect heating, located in Marion County, and in existence prior to September 21, 1983, then 326 IAC 6-2-2 applies. The emission units were existing and in operation before June 8, 1972. Therefore, pursuant to 326 IAC 6-2-2(b), Q shall reflect the total source capacity on June 8, 1972.

Particulate Matter (PM) [326 IAC 6-2-2]

Pursuant to 326 IAC 6-2-2 (Particulate Matter Emissions for Sources of Indirect Heating), the PM emissions from each emission unit #1 and #2 shall not exceed 0.43 pound per million Btu (lb/MMBtu) heat input. This limitation was calculated using the following equation:

$$Pt = \frac{0.87}{Q^{0.16}} \quad \text{Where: } Pt = \text{Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input}$$

Sulfur Dioxide (SO₂) 326 IAC 7-1.1-1

Since each emission unit has the potential to emit twenty-five (25) tons per year or ten (10) pounds per hour of sulfur dioxide emission units #1 and #2 shall comply with the limitations in 326 IAC 7-1.1-2.

326 IAC 7-1.1-2 (Sulfur Dioxide Emissions Limitations: specified)

Pursuant 326 IAC 7-1.1-2, sulfur dioxide emissions from emission units #1 and #2 are each limited to 0.5 pounds per million BTU for distillate oil combustion (fuel oil #2).

Animal by-products rendering system, identified as emission unit #3

Volatile Organic Compounds (VOC) 326 IAC 8-1-6

This facility was constructed after January 1, 1980, however potential emissions are limited to less than twenty-five tons per year. Therefore, 326 IAC 8-1-6 does not apply.

Volatile Organic Compounds (VOC) Limit

- (a) The VOC emission from Emission Unit #3 shall be limited to less than 0.400 pounds per ton of meat meal production.
- (b) Meat meal production usage shall be limited to 36,000 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. This limit is equivalent to limiting VOC emissions from the emission unit to less than (25) tons per twelve (12) consecutive month period. Therefore, 326 IAC 2-7 (Part 70 Permit Program) and 326 IAC 8-1-6 (General VOC Reduction Requirements) does not apply.

Particulate Matter (PM) 326 IAC 6-1-1 and 326 IAC 6-3-1

Marion County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-12 and neither have the potential to emit one hundred (100) tons per year of PM or actual emissions of ten (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

326 IAC 6-3-1 is applicable to particulate emissions from Manufacturing process located anywhere in the state. Since emission unit #3 meets the definition of Manufacturing process, 326 IAC 6-3-2(e) is applicable.

Particulate (326 IAC 6-3-2(e))

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), the allowable particulate emission rate from Emission Unit # 3 shall not exceed 11.85 pounds per hour when operating at a process weight rate of 170,820 tons per year.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

Emission Unit ID's #4,#5,#6, and #7

Particulate Matter (PM) 326 IAC 6-1-1 and 326 IAC 6-3-1

Marion County is listed under 326 IAC 6-1-7. However, neither the source nor facilities are listed in 326 IAC 6-1-12 and neither have the potential to emit one hundred (100) tons per year of PM or actuals of ten (10) tons or more of PM per year. Therefore, no 326 IAC 6-1 limits apply.

326 IAC 6-3-1 is applicable to particulate emissions from Manufacturing process located anywhere in the state. Since emission units #4,#5,#6, and #7 meet the definition of Manufacturing process, 326 IAC 6-3-2(e) is applicable.

Particulate (326 IAC 6-3-2(e))

Pursuant to 326 IAC 6-3-2(e) (Particulate Emission Limitations for Manufacturing Processes), particulate from the emission unit ID's #4, #5 and #6 and #7 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

- (a) Process weight for Hammer Mill, emission unit #4, will not exceed 12.05 pounds per hour based on a process weight rate of 12.5 tons per hour.

- (b) Process weight for Truck Unload Pit, emission unit #5, will not exceed 22.27 pounds per hour based on a process weight rate of 25 tons per hour.
- (c) Process weight for Link Belt Conveyors, emission units #6 and #7, will not exceed 35.43 pounds per hour each based on a process weight rate of 5 tons per hour.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

All compliance requirements from previous approvals were incorporated into this FESOP.

1. Emission units #1 and #2 have an applicable compliance monitoring condition as specified below:

Visible emissions notations of the Two (2) natural gas and fuel oil #2 fired boilers shall be performed once per shift, during normal daylight operations, when combusting #2 fuel oil. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

The monitoring condition is necessary to ensure compliance with 326 IAC 6-2-2.

2. Emission unit #3 has applicable compliance monitoring conditions as specified below:
 - (a) Visible emissions notations of the animal by-products rendering system shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency

and response steps for when an abnormal emission is observed.

- (b) The Permittee shall record the total static pressure drop across the Venturi Scrubber VCS-008 and the Packed Bed Tower Scrubber PCT-008 controlling the animal by-products rendering system, at least once daily when the animal by-products rendering system is in operation. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the Venturi Scrubber VCS-008 and the Packed Bed Tower Scrubber PCT-008 shall be maintained within the range of 2.0 to 10.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

These monitoring conditions are necessary because to ensure compliance with 326 IAC 6-3 (Manufacturing process).

3. Emission units #4, #5, #6, and #7 have an applicable compliance monitoring condition as specified below:

Visible emissions notations of emission units #4, #5, #6, and #7 shall be performed once per shift during normal daylight operations. A trained employee will record whether emissions are normal or abnormal. For processes operated continuously "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

These monitoring conditions are necessary because to ensure compliance with 326 IAC 6-3 (Manufacturing process).

Conclusion

The operation of the boilers and the animal by-products rendering system will be subject to the conditions of the attached proposed FESOP No. F097-14070-00243.